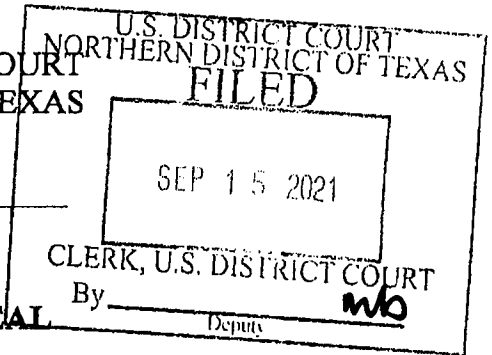


ORIGINAL

SEALED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION



UNITED STATES OF AMERICA

v.

AFEEZ ABIOLA ALAO (01)

UNDER SEAL

CRIMINAL NO.

**3-21CR0434-S**

7

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Commit Wire Fraud

[Violation of 18 U.S.C. § 1349 and 18 U.S.C. § 1343]

1. Beginning at least as early as December 15, 2015, and continuing through at least May 4, 2017, the exact dates being unknown to the Grand Jury, in the Northern District of Texas, and elsewhere, the defendant, **Afeez Abiola Alao**, did knowingly combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to commit the following offense, namely, to knowingly and willfully devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme to defraud did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, specifically, wire transfers of funds from romance scam victims into his and his co-conspirators' bank accounts, in violation of Title 18, United States Code, Section 1343.

Purpose of the Conspiracy and Scheme to Defraud

1. The purpose of the conspiracy was to: (a) make materially false and fraudulent pretenses, representations, and promises to individuals targeted on dating websites about their identities to induce the targets of the romance scams to send them funds; and (b) use the proceeds received from the romance scams for their own benefit and for purposes other than those represented to the romance scam victims.

Manner and Means of the Conspiracy and Scheme to Defraud

2. It was part of the conspiracy and scheme and artifice to defraud, and among the manner and means by which the defendant and his co-conspirators carried out the conspiracy, that:

- a. Co-conspirators targeted older, often widowed or divorced individuals, with savings, as romantic interests on dating websites such as Match.com and OurTime.com;
- b. Co-conspirators created false and fraudulent identities and backgrounds on dating websites to appear to be individuals living in the United States to gain the romance victims' confidence and trust;
- c. Co-conspirators often communicated with their romance scam victims through the dating websites as well as via email and text but never met their victims in person;
- d. After developing the romance victims' confidence and trust, the co-conspirators falsely and fraudulently claimed that they had to travel abroad for business, travel abroad to collect an inheritance, or had bills to pay

abroad and then falsely and fraudulently claimed they were unable to access their bank accounts in the United States;

- e. Co-conspirators then directed the romance scam victims to send money to specific accounts under false and fraudulent pretenses;
- f. Co-conspirators typically removed the funds received from romance scams victim from the account that initially received them within days by making cash withdrawals;
- g. Once a romance scam victim had sent money to one co-conspirator, that victim was often instructed to send money to other co-conspirators;
- h. After the co-conspirators depleted the victims of all funds the victims were able and willing to send, often depleting victims' of their entire savings, the co-conspirators stopped communicating with the victims.

3. It was part of the conspiracy and scheme and artifice to defraud, and among the manner and means by which the defendant and his co-conspirators carried out the conspiracy, that:

- a. On or about December 15, 2015, one or more co-conspirators using the name "Sonya Alpough" caused romance scam victim whose initials are RB, met through an online dating site, to wire \$24,000 from his Merrill Lynch and Co., Inc. account in New York via FedWire to an account ending in 8779 at BBVA Compass Bank in Carrollton, Texas, in the name of Aviz Auto Services whose sole signatory is Afeez Abiola Alao, purportedly to pay taxes for Brazil to release a multi-million dollar inheritance;

- b. On or about December 15, 2015, and December 16, 2015, in two separate transactions, **Afeez Abiola Alao** withdrew \$22,000 from his account ending in 8779 at BBVA Compass Bank;
- c. On or about March 28, 2016, one or more co-conspirators using the name "Michael Newell" caused romance scam victim whose initials are JS, met through Match.com, to wire \$87,000 via FedWire from her account ending in 9098 at USAA Federal Savings Bank in South Carolina to an account ending in 3754 at Comerica Bank in Carrollton, Texas, in the name of Aviz Auto Services whose sole signatory is **Afeez Abiola Alao**, purportedly for a new computer;
- d. Between approximately March 28, 2016, and March 30, 2016, in five separate transactions, **Afeez Abiola Alao** withdrew \$79,750 from his account ending in 8779 at BBVA Compass Bank;
- e. On or about April 4, 2016, one or more co-conspirators caused romance scam victim whose initials are MC, met through an online dating site, to wire \$23,550 via FedWire from his account ending in 4835 at TD Bank in New York to an account ending in 3754 at Comerica Bank in Carrollton, Texas, in the name of Aviz Auto Services whose sole signatory is **Afeez Abiola Alao**, purportedly to help a female travel from overseas and for an investment;

- f. On or about April 4, 2016, in two separate transactions, **Afeez Abiola Alao** withdrew \$19,000 from his account ending in 8779 at BBVA Compass Bank; the same day, he made two purchases at Kroger totaling \$2,801.38;
- g. On or about June 23, 2016, one or more co-conspirators using the name "Heidi Sharp" caused romance scam victim whose initials are NH, met through dating site OurTime.com, to wire \$38,000 via FedWire from his account ending in 4810 at Community Resource Credit Union in Baytown, Texas to an account ending in 3754 at Comerica Bank in Carrollton, Texas, in the name of Aviz Auto Services whose sole signatory is **Afeez Abiola Alao**, purportedly to help pay taxes so that she can access a million-dollar trust fund;
- h. On or about June 23, 2016, and June 24, 2016, in three separate transactions, **Afeez Abiola Alao** withdrew all \$38,000 from his account ending in 8779 at BBVA Compass Bank;
- i. On or about January 4, 2017, one or more co-conspirators using the name "Brian Phelps" caused romance scam victims whose initials are JS and BC, met through a dating site, to wire \$45,000 via FedWire from her account ending in 2633 at Bank of the Ozarks in Georgia to an account ending in 5196 at J.P. Morgan Chase Bank in Dallas, Texas, in the name of Aviz Auto Services whose sole signatory is **Afeez Abiola Alao**, purportedly to help Phelps with debts he owed relating to construction overseas;

- j. On or about January 6, 2017, one or more co-conspirators using the name “Brian Phelps” caused romance scam victims whose initials are JS and BC, met through a dating site, to wire \$30,000 via FedWire from her account ending in 2633 at Bank of the Ozarks in Georgia to an account ending in 5196 at J.P. Morgan Chase Bank in Dallas, Texas, in the name of Aviz Auto Services whose sole signatory is **Afeez Abiola Alao**, purportedly to help Phelps with debts he owed relating to construction overseas;
- k. Between approximately January 4, 2017, and January 9, 2017, in 12 separate transactions, **Afeez Abiola Alao** withdrew approximately \$70,707.95 of the \$75,000 he had received from JS and BC from his account ending in 5196 at J.P. Chase Morgan Bank;
- l. On or about May 4, 2017, one or more co-conspirators using the name “Adol Barry” caused romance scam victim whose initials are JM, met through a dating site, to wire \$20,000 via FedWire from his account ending in 8654 at US Bank in Oregon to an account ending in 2354 at Woodforest National Bank in Dallas, Texas, in the name of Aviz Auto Services whose sole signatory is **Afeez Abiola Alao**, purportedly to help Barry travel overseas to collect an inheritance;
- m. On or about May 4, 2017, in three separate transactions, **Afeez Abiola Alao** withdrew all \$20,000 from his account ending in 2354 at Woodforest National Bank.

All in violation of 18 U.S.C. § 1349.

Count Two

Conspiracy to Launder Monetary Instruments  
[Violation of 18 U.S.C. §§ 1956(h) and 1957]

Beginning at least as early as December 15, 2015, and continuing through at least May 4, 2017, the exact dates being unknown to the Grand Jury, in the Northern District of Texas, and elsewhere, the defendant, **Afeez Abiola Alao**, did knowingly combine, conspire, confederate, and agree with other persons, known and unknown to the Grand Jury, to commit the following offenses against the United States in violation of 18 U.S.C. § 1956(h), namely:

(a) to knowingly engage, or attempt to engage, in a monetary transaction involving the proceeds of a specified unlawful activity, namely, conspiracy to commit wire fraud in violation of Title 18, United States Code, Section 1349, in an amount greater than \$10,000, by, through, or to a financial institution and that while engaging and attempting to engage in such monetary transaction, knew that the property involved in the transaction was criminally derived, in violation of 18 U.S.C. § 1957.

All in violation of 18 U.S.C. § 1956(h).

Notice of Criminal Forfeiture

[18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(1)]

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction of any offense violating 18 U.S.C. §§ 1349 and 1343, the defendant, **Afeez Abiola Alao**, shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the scheme to defraud.

Pursuant to 18 U.S.C. § 982(a)(1), upon conviction of any offense in violation of 18 U.S.C. § 1956(h), the defendant, **Afeez Abiola Alao**, shall forfeit to the United States of America any property, real or personal, involved in the money laundering conspiracy, and any property traceable to such property.

The property to be forfeited includes, but is not limited to:

- The property to be forfeited may take the form of a forfeiture “money” judgment; and
- Substitute property as allowed by 28 U.S.C. § 2461(c), 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p).


[nothing further on this page]




A TRUE BILL

  
FOREPERSON

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THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

AFEEZ ABIOLA ALAO

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SEALED INDICTMENT

18 U.S.C. § 1349 and 18 U.S.C. § 1343  
Conspiracy to Commit Wire Fraud  
(Count 1)

18 U.S.C. §§ 1956(h) and 1957  
Conspiracy to Launder Monetary Instruments  
(Count 2)

18 U.S.C. § 981 (a)(1)(C), 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(1)  
Forfeiture Notice

2 Counts

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A true bill rendered

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FORT WORTH

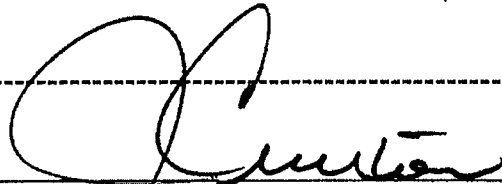
  
FOREPERSON

Filed in open court this 15<sup>th</sup> day of September, 2021.

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Warrant to be Issued

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UNITED STATES MAGISTRATE JUDGE  
No Criminal Matter Pending